



COUNT TWO

Transportation of Stolen Vehicle; Aiding and Abetting  
(18 U.S.C. §§ 2312 and 2)

The Grand Jury further charges:

On or about July 17, 2019, in Randolph, in the District of Massachusetts, and elsewhere,  
the defendant,

QUINCY HAROLD,

did transport in interstate commerce a motor vehicle, that is, an Audi Model A6 automobile  
bearing Rhode Island registration FV431, knowing the same to have been stolen.

All in violation of Title 18, United States Code, Sections 2312 and 2.

FIREARM FORFEITURE ALLEGATION  
(26 U.S.C. § 5872 and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 26, United States Code, Section 5861(d), charged in Count One, the defendant,

QUINCY HAROLD,

shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in the offense. The property to be forfeited includes, but is not limited to, the following:

a. A Remington Arms Company, Inc., Model 870, 20 gauge shotgun bearing serial number 493577X.

b. Three 20-gauge shotgun shells.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant(s) up to the value of the property described in Paragraph 1 above.

All pursuant to Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461.

A TRUE BILL

  
FOREPERSON

  
ROBERT E. RICHARDSON  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: SEPTEMBER 26, 2019  
Returned into the District Court by the Grand Jurors and filed

